

SL 2014-120 Report Dare County Department of Health and Human Services -  
Public Health Division

**Part 1A: On-site Water Protection: Standardize Certain Regulatory Review Procedures**

*Reference Session Law 2014-120, Section 29.(b).*

Background: The Dare County Public Health Division (DCPHD) receives Regulatory Submittals for review as provided for in statute and rule. The processes for review are described below.

**Responsibilities**

(a) The permitting of a wastewater system shall be the responsibility of agents authorized by the State in accordance with G.S. 130A-40, 130A-50, and registered with the State of North Carolina Board of Sanitarian Examiners if required in G.S. 90A Article 4.

(b) The person owning or controlling the system shall be responsible for assuring compliance with the laws, rules, and permit conditions regarding system location, installation, operation, maintenance, monitoring, reporting, and repair.

(c) Prior to the issuance of an Improvement Permit or Construction Authorization, plans and specifications may be required by the DCPHD where there is an unsuitable soil or unsuitable characteristic and shall be required for drainage systems serving two or more lots. These plans and specifications shall be required to be prepared by a person or persons who are licensed or registered to consult, investigate, evaluate, plan or design wastewater systems, soil and rock characteristics, ground water hydrology, or drainage systems if required in G.S. 89C, 89E, 89F, and 90A Article 4.

(d) Any wastewater system which meets one or more of the following conditions shall be designed by a registered professional engineer if required by G.S. 89C:

(1) The system is designed to handle over 3,000 gallons per day, as determined in Rule .1949(a) or (b) of this Section, except where the system is limited to an individual septic tank system serving an individual dwelling unit or several individual septic tank systems, each serving an individual dwelling unit.

(2) The system requires pretreatment before disposal, other than by a conventional septic or other system approved under Rule .1957 or .1969 of this Section.

(3) The system requires use of sewage pumps prior to the septic tank or other pretreatment system, except for systems subject to the North Carolina Plumbing code or which consist of grinder pumps and associated pump basins that are approved and listed in accordance with standards adopted by the National Sanitation Foundation.

(4) The individual system is required by Rule .1952 of this Section to use more than one pump or siphon in a single pump tank.

(5) The system includes a collection sewer, prior to the septic tank or other pretreatment system, which serves two or more buildings, except for systems subject to the North Carolina Plumbing Code.

(6) The system includes structures which have not been pre-engineered.

(7) The system is designed for the collection, treatment and disposal of industrial process wastewater, except under the following circumstances:

(A) the State has determined that the wastewater generated by the proposed facility has a pollutant strength which is lower than or equal to domestic sewage, and does not require specialized pretreatment or management, or

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- (B) the State has pre-approved a predesigned pretreatment system or process and management method proposed by the facility owner which shall enable the industrial process wastewater to have a pollutant strength which is lower than or equal to domestic sewage.
- (8) Any other system serving a business or multi-family dwelling so specified by the local health department.
- (e) The State shall review and approve the system layout on a site plan or plat, plans and specifications for all systems serving a design unit with a design flow greater than 3,000 gallons per day, as determined in Rule .1949(a) or (b) of this Section, except:
  - (1) where the system is limited to an individual septic tank system serving an individual dwelling unit or several individual septic tank systems, each serving an individual dwelling unit, or
  - (2) where the system consists of individual septic tank systems, each serving an individual facility, and which meets all of the following criteria;
    - (A) each individual system's design flow does not exceed 1500 gallons per day, as determined in Rule .1949(a) or (b) of this Section,
    - (B) the site for the nitrification field and repair area for each individual system is at least 20 feet from any other individual system site, and
    - (C) the design wastewater loading on the lot or tract of land containing the design unit is less than 1,500 gallons per day per acre for new or expanded systems and 3,000 gallons per day/acre for malfunctioning systems.
- (f) The state shall also review and approve plans and specifications for any industrial process wastewater system required by this Section to be designed by a registered professional engineer and any other system so specified by the local health department.

### Application submittal

- (a) An application for an Improvement Permit or Construction Authorization, as applicable, shall be submitted to the local health department for each site prior to the construction, location, or relocation of a residence, place of business, or place of public assembly. Applications for systems required to be designed by a professional engineer and applications for industrial process wastewater systems shall meet the provisions of Rule .1938 of this Section.

### Daily Design Flow Review Process

1. The Dare County Public Health Division, EH Unit staff (hereafter "EHS") receive a project submittal for the proposed daily design flow and completed the review.
2. If the proposed daily design flow is approved, then a soil and site evaluation review will be conducted.
3. If the proposed daily design is not approved and the required revision and/or additional information identified by the EHS is submitted, then the proposal is reviewed again.
4. If the proposed daily design is not approved and the Submitting Party declines to make the required revisions and/or provide the required additional information identified by the EHS, the Submitting Party may request an Informal Internal Review by the State.

### Soil and Site Evaluation Process

1. Site Visit:

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- a. The EHS visits the site, reviews the submitted site plan soil and any site, and evaluates the site.
  - b. The EHS determines the long-term acceptance rate (LTAR), configuration and installation depths of drainfield(s), treatment standard and any other design requirements dictated by the soil and site conditions.
2. The EHS provides all concerned parties with written documentation of the LTAR, drainfield configuration and installation depth, treatment standard, site modifications and any other design requirements.
3. Site evaluations shall be made in accordance with Rules .1940 through .1948. Based on this evaluation, each of the factors listed in Paragraph (a) of this Rule shall be classified as SUITABLE (S), PROVISIONALLY SUITABLE (PS), or UNSUITABLE (U).

### Preliminary Site Plan Review

1. The applicant's PE prepares and submits a preliminary site plan showing system location, configuration and layout based upon the EHS report.
2. The EHS reviews the site plan and layout and updates the file review.
3. The EHS communicates to the Submitting Party, the PE, and/ or other applicable parties, one of the following:
  - a. Approval of the site plan;
  - b. A request for revisions that include:
    - (a) A section detailing any required revisions with citation of applicable statute(s) or rule(s).
    - (b) A section detailing any suggested or recommended revisions based upon current knowledge base (guidance, manuals, or standards of practice);
  - c. A request for additional information that includes:
    - (a) A section detailing any required additional information with citations to statute(s) or rule(s); and
    - (b) A section detailing any suggested additional information based upon current knowledge base (guidance, manuals or standards of practice).
4. If the preliminary site plan is approved, then system engineering plans and specifications review will be conducted. The EHS can now issue the Improvement Permit (IP) upon confirmation of:
  - a. Approval of soil and site evaluation, site plan and layout, and site loading capacity analysis;
  - b. Approval of the field layout of the initial and repair drainfields and;
  - c. Identification and specification of any permit conditions.
5. If the preliminary site plan is not approved and the required revision and/or additional information identified by the staff engineer is submitted, then the proposal is reviewed again.
6. If the preliminary site plan is not approved and the Submitting Party declines to make the required revisions and/or provide the required additional information identified by the staff engineer, then the Submitting Party may request an Informal Internal Review by the State.

### System Engineering Plans and Specifications Review

1. The EHS receives the system engineering plans and specifications.
2. The EHS reviews system engineering plans and specifications and

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updates the project status in the file.

3. The EHS will issue communicate to the Submitting Party, the PE and other applicable parties, one of the following:

- a. An approval of the system engineering plans and specifications;
- b. A request for revisions that include:
  - (a) A section detailing any required revisions with citation of applicable statute or rule(s);
  - (b) A section detailing any suggested or recommended revisions based upon current knowledge base (guidance, manuals or standards of practice).
- c. A request for additional information that includes:
  - (a) A section detailing any required additional information with citations of applicable statute or rule(s) and;
  - (b) A section detailing any suggested additional information based upon current knowledge base (guidance, manuals, or standards of practice).

4. If the proposed system engineering plans and specifications are not approved and the required revision and/or additional information identified by the staff engineer is submitted, then the proposal is reviewed again.

5. If the system engineering plans and specifications are not approved and the Submitting Party declines to make the required revisions and/or provide the required additional information identified by the staff engineer, then the EHS will issue a denial letter of the project submittal to the Submitting Party, the PE, and other applicable parties.

6. The Submitting party may request an Informal Internal Review by the State.

### Optional Preconstruction Meeting

The Dare County Public Health Division strongly recommends a preconstruction meeting on engineered systems with all applicable parties.

### System Start-Up Inspection

1. The PE and the EHS determine that system construction is complete.
2. The PE, EHS, and installer and (if available) the operator conduct a system start-up inspection to document baseline performance parameters.
  - a. All parties document any deficiencies in the installation and develop plans to correct them.
  - b. The parties either agree to meet on the site again to document correction of deficiencies or allow the PE to independently oversee correction and provide documentation to that effect.
3. The EHS issues the Operation Permit (OP) upon:
  - a. Receipt of certifications by all licensed professionals, including record (“asbuilt”) drawings if significant changes to the system design occurred during installation [15A NCAC 18A .1938(h)];
  - b. Receipt of updated Operation and Maintenance procedures and manual prepared by the PE, incorporating O&M requirements specific to the equipment provided by system component manufacturers [15A NCAC 18A .1939(i)(4)];
  - c. Confirmed execution and recordation of all required legal documents [15A NCAC 18A .1937(h), 15A NCAC 18A .1938(j)];
  - d. Receipt of a copy of a contract with an operator [15A NCAC 18A .1961(e)] certified by the Water Pollution Control System Operators Certification Commission to operate and maintain this system (G.S. 90A-46) and;

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e. Confirmation that any requirements listed in the IP and CA (or referenced in the OSWP approval letter) are complete, inspected or reviewed, and approved by the LHD and/or the OSWP.

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**Part 1B: Food Protection and Facilities Branch:**  
**Standardize Certain Regulatory Review Procedures**  
*Reference Session Law 2014-120, Section 29.(b).*

I. Background: The Food Protection and Facilities Branch (FPF) reviews plan submittals for prototype food establishments to be franchised in multiple counties. The Dare County Public Health Division environmental health staff (DCPHD) acting as authorized agents of the Department review individual food establishment plans. Plans for construction of public swimming pools are also reviewed by DCPHD staff acting as agents of the Department with technical assistance from the FPF staff. Plan review checklists are used to assure uniform review for compliance with the rules.

A. A Food Service Plan Review Application form and guidance are provided to assure all needed information is in order for approval.

B. A public Swimming Pool Plan Review Checklist is used to check pool plans to assure all safety requirements and circulation system components are able to meet the water quality requirements.

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**Part 2A: On-site Water Protection Branch Informal Internal Review Processes  
and  
Procedures to Develop and Maintain a List of Review Engineers**

*Reference Session Law 2014-120, Section 29.(c).*

Reference here is made to the SL 2014-120 Report DHHS DPH EHS document. (Please see below):

**I. Definitions**

The following definitions apply throughout this document:

- A. Practice of Engineering. – As defined in G.S. 89C-3.
- B. Professional Engineer (PE). – As defined in G.S. 89C-3.
- C. Regulatory Authority. – The Department of Environment and Natural Resources, the Department of Health and Human Services, and any unit of local government operating a program (i) that grants permits, licenses, or approvals to the public and (ii) that is either approved by or delegated authority from the Department of Environment and Natural Resources or the Department of Health and Human Services.
- D. Regulatory Submittal. – An application or other submittal to a Regulatory Authority for a permit, license, or approval. In the case of a unit of local government, Regulatory Submittal shall mean an application or submittal submitted to a program approved by or delegated authority from the Department of Environment and Natural Resources or the Department of Health and Human Services.
- E. Submitting Party. – The person submitting the Regulatory Submittal to the Regulatory Authority.

**II. Scope:**

This guidance is applicable to Regulatory Submittals prepared, sealed and signed by a professional engineer licensed pursuant to Chapter 89C of the General Statutes. These Regulatory Submittals are reviewed by either the On-Site Water Protection Branch (OSWP) or the local health department (LHD) environmental health staff acting under delegated authority.

A. Regulatory Submittals that include the following must be submitted to OSWP for review:

- 1. Systems with design daily flows > 3,000 total gallons per day [15A NCAC 18A .1938(e)];
- 2. Systems designed pursuant to 15A NCAC 18A .1949 (c) or (d);
- 3. Systems designed for treatment of industrial process wastewater (IPWW) [15A NCAC 18A .1938(f)];
- 4. Prefabricated septic tanks, pumps tanks, effluent filters, risers and riser covers, and pipe penetrations [15A NCAC 18A .1953 and .1954];
- 5. Residential wastewater treatment systems [15A NCAC 18A .1957(c)]; and
- 6. Applications for wastewater systems, components, or devices that are submitted under Rule 15A NCAC 18A .1969.

B. Other Regulatory Submittals are submitted directly to the LDH who, in turn, either reviews

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or requests review by OSWP [15A NCAC 18A .1938(f)].

III. Informal Internal Review Process

North Carolina Session Law 2014-120, Section 29(c) identifies two circumstances that allow a Submitting Party to request an Informal Internal Review of the LHD or OSWP review:

A. The Regulatory Submittal includes a design or practice sealed by a PE that is not included in the Regulatory Authority's existing guidance, manuals or standard operating procedures.

The internal review process for these requests depends on whether the Regulatory Submittal was submitted to the LHD or OSWP:

1. Submittal to OSWP

- a. The OSWP staff engineer (hereafter "staff engineer") reviews the Regulatory Submittal in accordance with procedures outlined in Part IA of this report.
- b. If the staff engineer is not a NC licensed PE, then the Submitting Party may request an Informal Internal review by the reviewer's supervisor.
- c. If the reviewer's supervisor is not a NC licensed PE, review may be provided by a consulting NC licensed PE selected from a list developed and maintained by the Regulatory Authority in accordance with Article 3D of Chapter 143 of the North Carolina General Statutes.
- d. The Regulatory Authority may charge the Submitting Party for costs of the review by the consulting NC licensed PE.
- e. The OSWP Branch has the authority to make the final decision, even if review of the Regulatory Submittal is conducted by a consulting NC licensed PE.

2. Submittal to LHD

- a. LHD Staff review the Regulatory Submittal
- b. If requested by the Submitting Party, informal review will be conducted by
  - (a) Reviewer's supervisor or,
  - (b) A staff engineer (NC licensed PE)
- c. If neither the LHD nor OSWP Branch employs a NC licensed PE that is qualified and competent to perform the review, then:
  - (a) Review may be provided by a consulting NC licensed PE selected from a list developed and maintained by the Regulatory Authority in accordance with Article 3D of Chapter 143 of the North Carolina General Statutes.
  - (b) The Regulatory Authority may charge the Submitting Party for costs of the review by the consulting NC licensed PE.
- d. The OSWP Branch will notify the LHD, the Submitting Party and other applicable parties of the decision reached during the Informal Internal Review process.
- e. The OSWP Branch has the authority to make the final decision, even if review of the Regulatory Submittal is conducted by a consulting NC licensed PE.

B. There is a disagreement between the reviewer of the Regulatory Submittal and the Submitting Party regarding whether statute or other regulatory authority mandates the

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revisions or requests for additional information made by the Regulatory Authority.

1. In these cases, the Regulatory Authority will conduct an informal hearing with one of the following groups, as appropriate:
  - a. A review panel including the Environmental Health Section Chief or their designee, LHD personnel, Stakeholders representative(s) chosen by the Submitting Party and others as appropriate for the following instances:
    - (a) Systems with design daily flows > 3,000 total gallons per day [15A NCAC 18A.1938(e)];
    - (b) Systems designed pursuant to 15A NCAC 18A .1949 (c) or (d);
    - (c) Systems designed for treatment of industrial process wastewater (IPWW) [15ANCAC 18A .1938(f)];
  - b. Members of the Experimental and Innovative (E&I) Technical Advisory Committee for the following types of Regulatory Submittals:
    - (a) Prefabricated septic tanks, pumps tanks, effluent filters, risers and riser covers, and pipe penetrations [15A NCAC 18A .1953 and .1954];
    - (b) Residential wastewater treatment systems [15A NCAC 18A .1957(c)]; and
    - (c) Applications for wastewater systems, components, or devices that are submitted under Rule 15A NCAC 18A .1969.
2. The OSWP Branch will notify the LHD, the Submitting Party and other applicable parties of the decision reached during the Informal Internal Review process.

IV. Procedure For Developing and Maintaining a List of PEs for Informal Internal Reviews

A. PEs for Informal Internal Reviews will be selected in accordance with Article 3D of Chapter 143 of the NC General Statutes (<http://www.ncbels.org/forms/minibrooksact.pdf>) including:

1. Announcing requirements for these engineering consultative services;
2. Selecting firms that are qualified to provide such services on the basis of demonstrated competent and qualification without regard to fee; and
3. Negotiating a contract.

B. The OSWP will publish an announcement of the need for Consultative Services on its website and request that various professional engineer associations such as NCBELS, PENC, and NSPE post our intention to compile this list on their websites.

C. Draft a Request for Inclusion on the EH Section's NCPE Informal Internal Review List for dissemination to the general professional engineer population. Using this form, respondents will provide:

1. Licensee's name;
2. NCPE license number;
3. Licensure field/area;
4. Contact information; and,
5. Years of experience designing ground absorption sewage treatment and dispersal systems.

D. The protocol to review Requests for Inclusion will include:

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1. Appropriate field of engineering expertise;
2. Benchmark minimum number of years engaged in this activity;
3. Benchmark minimum number of engineered designs approved.

E. The list will be finalized based on prequalification to do business in the state via the State of North Carolina Interactive Purchasing System.

F. The EH Section will post the list of PEs approved for Informal Internal Review processes on its website and update it as appropriate.”

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**Part 2B: Food Protection and Facilities Branch Informal Internal Review Processes  
and  
Procedures to Develop and Maintain a List of Review Engineers**

*Reference Session Law 2014-120, Section 29.(c).*

Reference here is made to the SL 20104-120 Report DHHS DPH EHS document. (Please see below):

**I. Definitions**

The following definitions apply throughout this document:

A. Practice of Engineering. – As defined in G.S. 89C-3.

B. Professional Engineer (PE). – As defined in G.S. 89C-3.

C. Regulatory Authority. – The Department of Environment and Natural Resources, the Department of Health and Human Services, and any unit of local government operating a program (i) that grants permits, licenses, or approvals to the public and (ii) that is either approved by or delegated authority from the Department of Environment and Natural Resources or the Department of Health and Human Services.

D. Regulatory Submittal. – An application or other submittal to a Regulatory Authority for a permit, license, or approval. In the case of a unit of local government, Regulatory Submittal shall mean an application or submittal submitted to a program approved by or delegated authority from the Department of Environment and Natural Resources or the Department of Health and Human Services.

E. Submitting Party. – The person submitting the Regulatory Submittal to the Regulatory Authority.

**II. Scope:**

This guidance is applicable to Regulatory Submittals which may be submitted by an engineer or architect for food establishment or public swimming pools and may apply to plans submitted for institutions that provide health care, confinement or educational services.

A. When plan approval is not granted on a submittal, the submitting party is notified of which rules are not met and what problems need to be corrected upon resubmittal.

B. If resubmittal does not fully comply with the rules, the process of resubmittal may be repeated or notification will be given that the plans are not approved, what rules are not met, and what the formal appeals procedure is, explaining that there is a 30-day window for formal appeals.

C. Differences of opinion regarding the interpretation of a rule may be resolved through an informal review as provided in rule 15A NCAC 18A .2676.

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### **15A NCAC 18A .2676 INFORMAL REVIEW PROCESS AND APPEALS PROCEDURE**

(a) If a permit holder disagrees with a decision of the local health department on the interpretation, application, or enforcement of the rules of this Section the permit holder may:

- (1) Request an informal review pursuant to Paragraphs (d) and (e) of this Rule; or
- (2) Initiate a contested case in accordance with G.S. 150B.

(b) The permit holder is not required to complete the alternative dispute resolution prior to initiating a contested case in accordance with G.S. 150B.

(c) When a petition for a contested case is filed, the informal review process shall terminate.

(d) If the permit holder requests an informal review, the request shall be in writing and shall be postmarked or hand delivered to the local health department within seven days of notice of the decision giving rise to the review. The request shall state the issues in dispute. If the inspection giving rise to the informal review was conducted by the Environmental Health Supervisor in the county or area where the food establishment is located, or when the county or area has only one registered environmental health specialist assigned to inspect food establishments, the Environmental Health Regional Specialist assigned to that county or area shall conduct the local informal review. As soon as possible, but at least within 30 days of receipt of the request, the person conducting the review shall contact the permit holder, provide that permit holder an opportunity to be heard on the issues in dispute and issue a written decision addressing the issues raised in the appeal. Copies of the decision shall be mailed to the permit holder and to the State Health Director. That decision shall be binding for the purposes of future inspections of the establishment in question unless modified pursuant to Paragraph (e) of this Rule or by the State Health Director.

(e) Following receipt of the written decision of the Environmental Health Supervisor or his or her representative issued pursuant to Paragraph (d) of this Rule, the permit holder who initiated the informal review may appeal the resulting decision to an Informal Review Officer designated by the Department to be responsible for final decisions on appeals from throughout the state. Notice of such appeal shall be in writing, shall include a copy of the Environmental Health Supervisor's or his or her representative's decision, and shall be postmarked or hand-delivered to the local health department and to the Department within seven days of receipt of the written decision issued pursuant to Paragraph (a) of this Rule. Within 35 days of receipt of this appeal, the designated Informal Review Officer shall hold a conference in Wake County. At least 10 days prior to the conference, the Informal Review Officer shall provide notice of the time and place of this conference to the permit holder and the Environmental Health Supervisor for the county or area where the issue arose. Within 10 days following the date of the conference, the Informal Review Officer shall issue a written decision addressing the issues raised in the appeal and that decision shall be binding for purposes of future inspections of the establishment in question unless modified pursuant to Paragraph (g) of this Rule or by the State Health Director.

(f) If the decision on appeal at the local or state level results in a change in the score resulting from an inspection of an establishment, the regulatory authority shall post a new grade card reflecting that new score.

(g) Appeals of the decision of the designated Informal Review Officer shall be in accordance with G.S. 150B.

(h) Nothing in this Rule shall impact the right of a permit holder to a reinspection pursuant to Rule .2661 of this Section.

*History Note: Authority G.S. 130A-248; S.L. 2011-394, Section 15(a);  
Eff. September 1, 2012.*

D. If the Submitting Party requests Informal Internal review by a PE, the FPF will follow the procedure described below.

### III. Procedure For Developing and Maintaining a List of PEs for Informal Internal Reviews

A. PEs for Informal Internal Reviews will be selected in accordance with Article 3D of Chapter 143 of the NC General Statutes (<http://www.ncbels.org/forms/minibrooksact.pdf>) including:

1. Announcing requirements for these engineering consultative services;
2. Selecting firms that are qualified to provide such services on the basis of demonstrated competent and qualification without regard to fee; and
3. Negotiating a contract.

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B. The FPF will publish an announcement of the need for Consultative Services on its website and request that various professional engineer associations such as NCBELS, PENC, and NSPE post our intention to compile this list on their websites.

C. Draft a Request for Inclusion on the EH Section NCPE Informal Internal Review List for dissemination to the general professional engineer population. Using this form, respondents will provide:

1. Licensee's name;
2. NCPE license number;
3. Licensure field/area;
4. Contact information; and,
5. Years of experience designing food service facilities or public swimming pools

D. The protocol to review Requests for Inclusion will include:

1. Appropriate field of engineering expertise;
2. Benchmark minimum number of years engaged in this activity;
3. Benchmark minimum number of engineered designs approved.

E. The list will be finalized based on prequalification to do business in the state via the State of North Carolina Interactive Purchasing System.

IV. The EH Section will post the list of PEs approved for Informal Internal Review processes on its website and update it as appropriate.”

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**Part 3A: Onsite Water Protection Review of Working Job Titles**

*Reference Session Law 2014-120, Section 29.(h).*

I. Review the Working Job Titles of every employee with job duties that include the review of Regulatory Submittals

A. There are five positions in the Dare County Public Health Division (DCPHD) with a working job title “Environmental Health Specialist” that regularly review Regulatory Submittals. The current position description for these does not require the employee be licensed in North Carolina as a registered Professional Engineer (PE) or possess the qualifications to become licensed within 12 months of employment. None of these five positions are currently filled by persons who are registered PEs.

II. Proposed working job title revision or other administrative measures

A. We recommend retaining the working job title of “Environmental Health Specialist” and making no job title revisions within the DCPHD, Environmental Health Unit at this time.

The justification for this recommendation includes the following:

1. The requirements of Section 29 of Session Law 2014-120 include an option for the Submitting Party to request an Informal Review by a PE on staff of the Regulatory Authority or the delegating or approving State agency. Because local health departments do not typically employ PEs, the State-level PE could fulfill this role by conducting the Informal Internal Review on behalf of the county upon request.

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**Part 3B: Food Protection and Facilities Branch Review of Working Job Titles**

*Reference Session Law 2014-120, Section 29.(h).*

I. Review the Working Job Titles of every employee with job duties that include the review of Regulatory Submittals

A. Three positions in the Dare County Public Health Division (DCPHD) conduct reviews of engineering plans. None of those position descriptions require that employees be licensed PEs.

II. Proposed working job title revision or other administrative measures

A. The DCPHD plans to retain the working titles for the Environmental Health Specialists.